CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 113

Responding Witness: Kent W. Blake

- Q-113. Identify each KU and parent company Board committee. Provide a copy of the KU and parent company Board committee meeting minutes for 2015 and 2016.
- A-113. None.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 114

Responding Witness: Daniel K. Arbough

- Q-114. List all procedures the Company follows to ensure that there was a proper assignment of costs to the test year and that the test year only includes charges incurred during the test period.
- A-114. See Filing Requirement Section 16(7)(c) and pages 2 through 7 of my direct testimony where the business planning process is described. This process ensures the proper assignment of charges in the correct period.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 115

Responding Witness: Valerie L. Scott

- Q-115. Provide a copy of each adjusting entry proposed by the Company's independent Auditors in the two most recent audits of the Company, the parent company, and the affiliated service company. Include supporting documentation.
- A-115. See the attachment for adjusting entries proposed by the Company's independent auditors for the two most recent audits of KU and LKE. No stand-alone audit is performed for the service company.

Attachment to Response to AG-1 Question No. 115 Page 1 of 4 Scott

Entity	LG&E and KU Energy LLC			Period Ended:	31-Dec-2015	Currency:	USD)		
Uncorrec	cted misstatements			۵	nalysis of misstater	ments Debit/(Credit)				
No.	Account	Assets	Assets	Liabilities	Liabilities	Equity	Effect on the	Income state	Income statement effect of	
		Current	Non-current	Current	Non-current	components	current period		ent period	the prior period
							OCI			
	(misstatements are recorded as journal entries with a description)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Non taxable	Prior period Non Debit/(Credit) taxable
	uescription)									Debit/(Credit) taxable
Factual n	nisstatements:									
1	Understatement of ECR regulatory asset									
	Electric utility revenues									(5,191,000)
										· · · · · · · · · · · · · · · · · · ·
2	Overstatement of Municipal true-up regulatory liability									
	Electric utility revenues									(4,820,000)
3	Overstatement of DSM revenues									
	Electric utility revenues									2,299,000
4	Overstatement of construction work in progress		r		-	-	•	-		
	Accounts payable			2,513,000						
	Construction work in progress		(2,513,000)							
Total of a	uncorrected misstatements before income tax	0	(2,513,000)	2,513,000	0	0	0	0	1	(7,712,000)
Total of t		0	(2,010,000)	2,010,000	0	0	0	0		(7,712,000)
Uncorrec	cted misstatements in income tax (current and deferred):									
4										
4	Recording of valuation allowance on tax credit carryforwards Income tax expense	1	r				1			3,109,000
Total of I	uncorrected misstatements	0	(2.513.000)	2,513,000	0	0	0	0	1	(4.603.000)
	statement amounts	765,000,000	13,325,000,000	(007,000,000)	(000,000,000,0)	(4 547 000 000)	3	364,000,000		344,000,000
				(967,000,000)	(8,606,000,000)	(4,517,000,000)]	364,000,000		344,000,000
Effect of	uncorrected misstatements on F/S amounts	0.0%			0.0%	0.0%	1		1	
		Memo: Total of nor	n-taxable items (ma	rked 'X' above)				0		0
		Uncorrected misst	atements before inc	ome tax			0.0%	0		(7,712,000)
		Less: Tax effect of	f misstatements at c	urrent year margin	al rate		39%	0	l	2,999,968
			atements in income					0		3,109,000
			of uncorrected miss		but before turnarou	und	0.0%	0		(1,603,032)
										(1,000,000)
		Turnaround effect	of prior period unco		ents I factual and projec	ted misstatements:		After tax 1,603,032	Memo: Before tax 7,712,000	
						ntal misstatements:		0	0	
		Cumulative effect of	of uncorrected miss	tatements, after tur	naround effect		0.4%	1,603,032	[
		Current year incom	a boforo tax					603.000.000	1	
		Current year incom						364,000,000		
		Guirent year incon	ne alter tax					304,000,000		

Communication schedule for uncorrected misstatements

Attachment to Response to AG-1 Question No. 115 Page 2 of 4 Scott

Entity:	Kentucky Utilities]		Period Ended:	31-Dec-2015	Currency	USD]			
Uncorrec	ted misstatements			А	nalysis of misstate	ments Debit/(Credit	t)				
No.	Account	Assets Current	Assets Non-current	Liabilities Current	Liabilities Non-current	Equity components	Effect on the current period OCI		ment effect of the ent period	Income statemen the prior pe	
	(misstatements are recorded as journal entries with a description)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Non taxable	Prior period Debit/(Credit)	Non taxable
Factual n	isstatements:										
1	Understatement of ECR regulatory asset										
	Electric utility revenues	1		r			1			(3,200,000)	
										-	
	•										
2	Overstatement of Municipal true-up regulatory liability	-			-	-		-			
	Electric utility revenues									(4,820,000)	
										-	
3	Overstatement of DSM revenues										
	Electric utility revenues		1		1	1	1	1		1,152,000)
							1				
4	Understatement of intercompany payable for jointly owned as	set expenses			-	-		-		. <u></u>	
	Other operation and maintenance							12,000,000		12,000,000)
	Accounts payable with affiliates			(12,000,000)							
5	Overstatement of construction work in progress										
-	Accounts payable				1,533,000						
	Construction work in progress			(1,533,000)							
Total of u	ncorrected misstatements before income tax	0	0	(13,533,000)	1,533,000	(0 0	12,000,000		5,132,000)
Total of u	ncorrected misstatements	0	0	(13,533,000)	1,533,000	0	0 0	12,000,000	1	5,132,000	1
		396,000,000	7,615,000,000	(15,555,000)	(4 399 000 000)	(2.297.000.000)					
	statement amounts	0.0%		(325,000,000)	(1,000,000,000)	(3,287,000,000	<u>/</u>	234,000,000		220,000,000	<u>'</u>
Effect of	uncorrected misstatements on F/S amounts	Memo: Total of nor	0.0%		0.0%	0.0%	Þ	0	I.		
		wento: Total of hor	i-taxable items (ma	rked x above)				0		0	
		Uncorrected missta	atements before inc	come tax			3.2%	12,000,000		5,132,000)
		Less: Tax effect of	misstatements at c	urrent year margina	al rate		39%	(4,668,000)		(1,996,348)	
		Uncorrected missta	atements in income	etax				0		0	1
		Cumulative effect of	of uncorrected miss	statements after tax	but before turnarou	ind	3.1%	7,332,000		3,135,652	2
		Turnaround effect	of prior period unco	orrected misstateme	I factual and projec			After tax (3,135,652)	Memo: Before tax (5,132,000)		-
		Cumulative effect of	of uncorrected miss	statements, after tur	-	ntal misstatements	1.8%	0 4,196,348	0		
		Current year incom	ne before tax					374,000,000	1		
		Current year incom						234,000,000			

Communication schedule for uncorrected misstatements

Attachment to Response to AG-1 Question No. 115 Page 3 of 4

Commu	inicatio	n schedule for uncorrected misstatements									1 age 5 01 1	
Entity:		LG&E and KU Energy LLC	1		Devied Finded:	31-Dec-2014	Currence	USD	1		Scott	
Entity:			1		Period Ended:	31-Dec-2014	Currency:	050	l			
Uncorrec	ted missta	atements			Ai	nalysis of misstater	nents Debit/(Credit)				
No.	W/P ref.	Account	Assets Current	Assets Non-current	Liabilities Current	Liabilities Non-current	Equity components	Effect on the current period OCI		ment effect of the ent period	Income statement the prior peri	
		(misstatements are recorded as journal entries with a description)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Non taxable	Prior period Debit/(Credit)	Non taxable
Factual m	nisstateme	ents:										
1		Understatement of bonus accrual										
		Operation and maintenance expense									1,307,000	
		Taxes, other than income									62,000	
2		Understatement of ECR regulatory asset										
		Regulatory assets	5,191,000									
		Electric utility revenues							(5,191,000)			
3		Reclass of long-term portion of prepaid contracts						-				
		Other noncurrent assets		2,423,000								
		Prepayments	(2,423,000)									
Total of u	ncorrocto	ed misstatements before income tax	2,768,000	2,423,000	0	0	0	0	(5,191,000)	1	1,369,000	
	nconecte		2,700,000	2,420,000	Ŭ	0	0	0	(0,101,000)		1,000,000	
Uncorrec	ted missta	atements in income tax (current and deferred):										
4		Recording of valuation allowance on DTA credit carryforward	ls									
		Income tax expense							3,109,000			
		Deferred income taxes				(3,109,000)						
Total of u	ncorrecte	d misstatements	2,768,000	2,423,000	0	(3,109,000)	0	0	(2,082,000)		1,369,000	
		t amounts	956,000,000	12,440,000,000	(2,245,000,000)	(6,903,000,000)	(4,248,000,000)		344,000,000		347,000,000	
		ed misstatements on F/S amounts	0.3%	0.0%	0.0%	0.0%	0.0%]				
			Memo: Total of non					1	0		0	
			Uncorrected missta	tements before inc	ome tax			-0.9%	(5,191,000)		1,369,000	
			Less: Tax effect of			l rate		39%	2,019,299		(532,541)	
			Uncorrected missta			li late		3970	3,109,000		(552,541)	
							- 4	0.0%	(62,701)		836,459	
			Cumulative effect o				na	0.0%		l 	630,439	
			Turnaround effect of	of prior period unco		ents I factual and project	ed misstatements:		After tax (836,459)	Memo: Before tax (1,369,000)		
							tal misstatements:		0	0		
			Cumulative effect o	f uncorrected miss	tatements, after turi	naround effect		-0.3%	(899,160)			
			Current year incom	e before tax					553,000,000			
			Current year incom	e after tax					344,000,000			

Attachment to Response to AG-1 Question No. 115 Page 4 of 4

Comm	unicatio	n schedule for uncorrected misstatements									Scott
Entity	:	Kentucky Utilities	7		Period Ended:	31-Dec-2014	Currency:	USD	1		Stott
			_					-			
	ted missta		Analysis of misstatements Debit/(Credit)								
No.	W/P ref.	Account	Assets Current	Assets Non-current	Liabilities Current	Liabilities Non-current	Equity components	Effect on the current period OCI		ment effect of the ent period	Income statement effect of the prior period
		(misstatements are recorded as journal entries with a description)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Non taxable	Prior period Non Debit/(Credit) taxable
Factual n	nisstateme	ents:									
1		Understatement of bonus accrual									
		Operation and maintenance expense									419,000
		Taxes, other than income									32,000
2		Understatement of ECR regulatory asset									
		Regulatory assets	3,200,000								
		Electric utility revenues							(3,200,000)		
Total of u	uncorrecte	d misstatements before income tax	3,200,000	0	0	0	0) 0	(3,200,000)		451,000
								1			· · ·
Total of u	uncorrecte	d misstatements	3,200,000	0	0	0	0	0 0	(3,200,000)		451,000
Financia	statemen	t amounts	459,000,000	7,256,000,000	(805,000,000)	(3,704,000,000)	(3,206,000,000))	220,000,000		228,000,000
Effect of	uncorrect	ed misstatements on F/S amounts	0.7%	0.0%	0.0%	0.0%	0.0%	b			
			Memo: Total of non	-taxable items (ma	rked 'X' above)				0		0
			Uncorrected missta	tements before inc	ome tax			-0.9%	(3,200,000)		451,000
			Less: Tax effect of	misstatements at c	urrent year margina	al rate		39%	1,244,800		(175,439)
			Uncorrected missta	tements in income	tax				0		0
			Cumulative effect o	f uncorrected miss	tatements after tax	but before turnarou	ind	-0.9%	(1,955,200)		275,561
			Turnaround effect of	of prior period unco		ents I factual and projec	ted misstatements:	:	After tax (275,561)	Memo: Before tax (451,000)	
			Cumulative effect o	f uncorrected miss	tatements, after tur	-	tal misstatements:	-1.0%	0 (2,230,761)	0	
			Current year incom	e before tax					355,000,000		
			Current year incom						220,000,000		

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 116

Responding Witness: Valerie L. Scott

- Q-116. Provide a copy of the Company's (and the parent company's) two most recent management letters and recommendations received from the Company's independent auditors.
- A-116. The Company has not received management letters or recommendations from the Company's independent auditors for at least the last fourteen years.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 117

Responding Witness: Robert M. Conroy

- Q-117. Provide a copy of the Company's most recent management and operations audit.
- A-117. On September 14, 2011 the PSC issued the Final Audit Report on the Focused Management and Operations Audit of Louisville Gas and Electric Company's and Kentucky Utilities Company's customer service functions. Below is the link to the final report. <u>http://psc.ky.gov/agencies/psc/M_Audit/KU%20LGE%20Final%20Report%20</u> with%20Letter.pdf

On November 10, 2011 the PSC issued the Management Audit Action Plans regarding the aforementioned management audit. Below is the link to the Action Plans.

http://psc.ky.gov/agencies/psc/M_Audit/LGE_KU_CS_Audit_Action_Plan_Fin al.pdf

On January 14, 2015 the PSC issued a press release which stated that all recommendations had been completed. Below is the link to the press release. http://psc.ky.gov/agencies/psc/press/012015/0114_r01.PDF

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 118

Responding Witness: Robert M. Conroy

Q-118. Have there been any independent audits or regulatory commission sponsored reviews done of KU in 2015 or 2016? If so, identify each such review and provide a copy of the related reports and testimony.

A-118. No.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 119

- Q-119. Indicate whether and how check-clearing time was included in the revenue or expense lag calculations in the lead-lag study. If included in the study, indicate the number of days it added to the lead or lag by category.
- A-119. See the response to Question No. 18.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 120

- Q-120. If check-clearing time was not included in the revenue or expense lag calculations in the lead-lag study, indicate the number of days between the receipt of a customer's payment and the time the Company has use of the funds. Also, provide an estimate of the number of days after a check mailed to a vendor is reduced from the Company's bank account. If the number of days varies by type of expense or vendor, indicate those differences if known. Indicate any payments made by wire (in total by expense category).
- A-120. See the response to Question No. 18.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 121

- Q-121. Indicate whether tax payment lead days are calculated on actual or statutory percentages and payment dates in the cash working capital calculation.
- A-121. See the response to Question No. 18.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 122

- Q-122. Indicate whether in the cash working capital calculation, the payroll expense lead day result is based upon a composite of the separate net wage lag and withholding deposit period lag, or whether it is based on the single lag associated with gross wages (i.e., middle of pay period to payroll date).
- A-122. See the response to Question No. 18.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 123

Responding Witness: John P. Malloy

- Q-123. Indicate the average period of time between rendering of service to customers to meter reading date (by type of customer if different), meter reading to billing date, and billing date to receipt of payment for Kentucky jurisdictional customers, if known; otherwise for total company if known
- A-123. See the tables below.

KU Average Billing Dates in Period

Customer Type	2016 Average Calendar Days
Commercial	30.0
Industrial	29.9
Public Authority	30.0
Residential	29.7
Wholesale Municipal	30.5

KU Meter Re	eading to E	Billing Date
-------------	-------------	--------------

Customer Type	2016 Average Calendar Days
Commercial	4.5
Industrial	3.9
Public Authority (1)	16.6
Residential	2.0
Wholesale Municipal (2)	13.3

- (1) Most Public Authority are on collective or summary billing. This explains the increased number of days.
- (2) Wholesale Municipal invoices are generated as estimated at the beginning of the month and then are trued up for actual fuel values tabulated each month. This delays the actual bills for a couple weeks. This is contractual process.

The billing date to payment receipt is not tracked by customer type. The 2016 KU including ODP average billing date to payment is 28.2 calendar days.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 124

Responding Witness: Valerie L. Scott

- Q-124. Provide for each month from December 2014 to the present, the following information:
 - a. Monthly revenues
 - b. Accounts receivable
 - c. Allowance for Doubtful Accounts
 - d. Accounts receivable (aging and amounts) net of uncollectibles.
- A-124. a. d. See attached.

	Kentucky Utilities Company Case Number 2016-00370										
	Summary of Kentucky Jurisdictional Monthly Revenues, Accounts Receivable, Allowance for Doubtful Accounts and AR Aging Net of Uncollectibles										
	1	2	3	4	5	6	1 + 2 + 3 + 4 + 5 + 6 = 7	8	7 - 8 = 9	10	11
Month	Open 0 - 30 Days	Open 31 - 60 Days	Open 61 - 90 Days	Open 91 - 120 Days	Open 121 - 365 Days	Open 365+ Days	Total Accounts Receivable	Total Uncollectibles	Total Accounts Receivable Net of Uncollectibles	Monthly Revenues	Allowance for Doubtful Account
	(d)	(d)	(d)	(d)	(d)	(d)	(b)	(d)	(d)	(a)	(c)
December 2014	\$ 92,142,788	\$ 7,972,806	\$ 994,730	\$ 631,122	\$ 1,161,868	\$ 170,336	\$ 103,073,648	\$ 511,629	\$ 102,562,020	\$ 131,296,098	\$ (1,979,6
January 2015	113,123,480	11,968,620	1,318,420	481,697	1,159,390	137,664	128,189,271	403,082	127,786,189	143,864,046	(2,005,9
February 2015	120,875,361	11,121,425	1,557,691	488,335	926,617	147,889	135,117,318	413,145	134,704,173	144,262,034	(2,177,7
March 2015	111,468,383	10,848,352	2,057,028	686,479	793,247	145,159	125,998,648	492,763	125,505,884	123,985,617	(2,387,2
April 2015	94,526,516	9,301,769	2,231,030	1,049,319	913,811	143,956	108,166,400	197,130	107,969,270	105,760,913	(2,288,4
May 2015	78,803,419	10,895,405	2,082,219	1,312,338	1,434,790	135,105	94,663,276	(1,801)	94,665,077	115,347,202	(2,081,9
June 2015	93,337,123	4,739,253	791,770	1,305,426	2,183,210	134,302	102,491,083	230,081	102,261,002	123,152,857	(1,953,6
July 2015	99,457,769	11,000,818	649,934	617,827	2,509,224	125,524	114,361,096	532,222	113,828,874	136,279,454	(1,887,0
August 2015	93,805,191	14,050,577	824,120	378,316	2,209,351	115,712	111,383,266	641,024	110,742,242	135,511,170	(1,875,1
September 2015	99,010,182	6,598,829	827,822	436,079	1,447,955	109,139	108,430,005	995,982	107,434,023	124,408,718	(1,982,5
October 2015	84,286,900	7,170,089	877,350	506,426	986,116	114,293	93,941,175	561,973	93,379,202	110,909,828	(1,910,
November 2015	82,193,247	8,270,221	932,439	552,118	1,016,069	105,438	93,069,531	47,984	93,021,547	109,777,959	(1,649,6
December 2015	82,155,467	10,833,999	970,003	553,522	1,102,340	99,692	95,715,023	229,777	95,485,246	116,778,353	(1,603,
January 2016	95,919,102	8,506,698	5,669,161	488,482	1,118,525	99,726	111,801,694	658,084	111,143,610	150,117,440	(1,699,2
February 2016	109,852,912	9,787,605	1,321,434	450,621	840,371	86,662	122,339,605	271,016	122,068,589	129,936,808	(1,751,
March 2016	93,846,416	10,188,849	1,675,390	486,530	741,159	101,539	107,039,883	320,848	106,719,035	113,171,958	(1,838,0
April 2016	84,010,111	7,723,703	1,926,447	766,061	676,139	86,174	95,188,635	160,622	95,028,013	109,824,991	(1,818,
May 2016	76,962,475	5,985,450	1,406,793	1,095,138	1,024,242	131,026	86,605,124	50,040	86,555,084	110,891,622	(1,670,
June 2016	84,718,920	4,464,940	953,917	817,257	1,507,382	131,190	92,593,607	174,850	92,418,757	131,829,134	(1,595,5
July 2016	103,977,049	7,624,368	1,035,299	546,285	1,702,016	125,681	115,010,696	311,334	114,699,362	140,977,565	(1,508,
August 2016	101,812,411	6,899,792	895,002	392,904	1,392,485	109,755	111,502,350	740,402	110,761,948	142,954,752	(1,609,
September 2016	107,885,454	7,657,165	914,373	517,747	1,086,563	100,723	118,162,025	453,476	117,708,549	125,609,634	(1,584,2
October 2016	82,985,766	10,812,635	1,065,276	611,251	964,212	99,385	96,538,524	247,053	96,291,471	110,614,499	(1,448,
November 2016	81,163,531	6,352,775	1,136,823	683,595	1,071,107	101,715	90,509,545	89,918	90,419,627	111,326,549	(1,364,
December 2016	96,776,777	6,724,863	993,177	625,767	1,301,825	82,754	106,505,163	164,657	106,340,507	136,874,604	(1,271,

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 125

Responding Witness: Christopher M. Garrett / Valerie L. Scott

Q-125. Customer Advances.

- a. What is the ratemaking treatment for customer advances proposed by the Company in its filing? Where is such proposal found in the filing?
- b. Provide the monthly level of customer advances for the period December 2014 through December 2016 and also provide monthly updates when available.
- c. Provide the monthly interest expense paid by the Company on customer advances for the same period.
- A-125. a. Customer advances are a reduction to rate base as shown on Schedule B-1, Tab 55 of the Filing Requirements.
 - b. Customer advances as of December 31, 2014 were \$2,189,028. See attached for the monthly level of customer advances for 2015 and 2016.
 - c. The Company does not pay interest on customer advances.

Kentucky Utilities Company					
Case No. 2	Case No. 2016-00370				
Customer Advance	s - Kentucky Only				
For the Calence	lar Year 2015				
As of	Balance				
January 31, 2015	\$ 2,152,771.21				
February 28, 2015	2,132,231.69				
March 31, 2015	2,120,172.94				
April 30, 2015	2,106,336.95				
May 31, 2015	2,061,640.99				
June 30, 2015	2,059,310.47				
July 31, 2015	2,023,372.33				
August 31, 2015	2,022,028.35				
September 30, 2015	2,010,715.41				
October 31, 2015	1,976,558.85				
November 30, 2015	1,962,232.87				
December 31, 2015	1,942,000.34				

Kentucky Utilities Company						
Case No. 2	016-00370					
Customer Advance	s - Kentucky Only					
For the Calence	lar Year 2016					
As of	Balance					
January 31, 2016	\$ 1,935,543.36					
February 28, 2016	1,879,537.67					
March 31, 2016	1,869,270.68					
April 30, 2016	1,844,719.77					
May 31, 2016	1,792,708.19					
June 30, 2016	1,548,687.19					
July 31, 2016	1,572,449.59					
August 31, 2016	1,549,721.13					
September 30, 2016	1,540,557.62					
October 31, 2016	1,519,916.62					
November 30, 2016	1,509,765.74					
December 31, 2016	1,495,929.75					

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 126

Responding Witness: Christopher M. Garrett / Valerie L. Scott

Q-126. Customer Deposits.

- a. What is the ratemaking treatment for customer deposits proposed by the Company? Where is such proposal found in the filing?
- b. Provide the monthly level of customer deposits for the period December 2014 through December 2016.
- c. Provide the monthly interest expense paid by the Company on customer deposits for the same period.
- A-126. a. For ratemaking purposes in this proceeding and in Case Nos. 2014-00371 (KU) and 2014-00372 (LG&E), the Companies followed the Commission's Order in Case No. 98-474 (KU) and Case No. 98-426 (LG&E) in which interest expenses on deposits are not included as a component of revenue requirement and customer deposits are not deducted from rate base or included as a component of capitalization.
 - b. See attached.
 - c. See attached.

Attachment to Response to AG-1 Question No. 126(b) Page 1 of 1 Scott

Kentucky Utilities Company							
	Case No. 2016-00370						
	Summary of Total Company Retail Customer Deposits						
Line No.	Month	Balance					
1.	December 2014	\$ 25,921,052					
2.	January 2015	25,838,752					
3.	February 2015	25,866,021					
4.	March 2015	25,827,297					
5.	April 2015	25,760,764					
6.	May 2015	25,528,751					
7.	June 2015	25,409,906					
8.	July 2015	25,102,803					
9.	August 2015	24,955,892					
10.	September 2015	24,826,077					
11.	October 2015	24,994,352					
12.	November 2015	24,818,297					
13.	December 2015	24,908,053					
14.	January 2016	25,155,462					
15.	February 2016	25,636,056					
16.	March 2016	25,874,230					
17.	April 2016	26,077,577					
18.	May 2016	26,186,484					
19.	June 2016	26,251,787					
20.	July 2016	26,394,071					
21.	August 2016	26,181,794					
22.	September 2016	26,490,650					
23.	October 2016	26,591,157					
24.	November 2016	26,808,705					
25.	December 2016	27,033,357					

Attachment to Response to AG-1 Question No. 126(c) Page 1 of 1 Scott

Kentucky Utilities Company							
	Case No. 2016-00370						
Sur	Summary of Total Company Interest Paid on Retail Customer Deposits						
Line No. Month Interest Paid							
1.	December 2014	\$ 209					
2.	January 2015	444					
3.	February 2015	384					
4.	March 2015	527					
5.	April 2015	794					
6.	May 2015	1,577					
7.	June 2015	26,889					
8.	July 2015	123					
9.	August 2015	183					
10.	September 2015	169					
11.	October 2015	225					
12.	November 2015	212					
13.	December 2015	369					
14.	January 2016	361					
15.	February 2016	511					
16.	March 2016	790					
17.	April 2016	897					
18.	May 2016	1,113					
19.	June 2016	54,856					
20.	July 2016	244					
21.	August 2016	611					
22.	September 2016	630					
23.	October 2016	715					
24.	November 2016	791					
25.	December 2016	891					

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 127

Responding Witness: Robert M. Conroy / John P. Malloy

Q-127. Customer Deposits.

- a. What is the interest rate on customer deposits?
- b. Identify the tariff or statute that establishes the interest rate.
- c. Does the Company accrue interest on inactive customer deposits?
- d. How often is interest on customer deposits paid?
- e. Is interest on customer deposits paid by check, in the form of a bill credit, or credited as an addition to the customer deposit balance?
- f. What is the Company's policy on customer deposits for collection, refund, and use as an offset against an uncollectible balance?
- g. Provide a copy of the Company's policy(s) relating to customer deposits.

A-127.

- a. The interest rate on customer deposits effective January 1, 2017 is 0.66%.
- b. KRS 278.460.
- c. The Company does not have inactive customer deposits.
- d. Annually, per 807 KAR 5:006 Section 8(6)(b).
- e. The interest is paid in the form of a bill credit.
- f. See response to g. below.
- g. See attachment. See also the Deposits section of the Company's tariff at Sheet Nos. 102 *et seq*. The Company's current tariff is available online at: <u>https://lge-ku.com/regulatory/rates-and-tariffs</u>

Residential service deposits are required from all new customers, based on the customer's credit score, provided by Experian, as well as existing customers who have been disconnected for nonpayment and are seeking to have service restored. Accounts requiring a security deposit may have the deposit billed in up to six monthly installments.

Residential service deposit amounts can be found in each utility's filed and approved tariffs.

Residential Deposits:

LG&E, KU and ODP residential service deposits are held a minimum of 12 months. LG&E and KU deposits earn interest determined by the KPSC annually, while ODP deposits earn interest determined by the Commonwealth of Virginia annually.

LG&E, KU and ODP deposits will be refunded (applied to the customer's account) at the end of the first 12 month period, in which the customer has not:

- Been disconnected for nonpayment, or
- Received a disconnect notice/budget reminder letter, or
- Had a returned check, or
- Had meter theft/tampering or diversion charges, or
- Defaulted on an installment plan

IMPORTANT: The maximum security deposit for a residential contract account **cannot** exceed the amount indicated in our approved tariffs.

For residential customers, personal guarantees or letters of credit from other utilities <u>ARE NOT</u> acceptable in lieu of a cash deposit.

Security deposits should not be required on non-metered contracts (typically outdoor lights) tied to residential contract accounts.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 128

Responding Witness: Valerie L. Scott

- Q-128. For the test year and the preceding two years, has the Company sold any property which had formerly been included in Plant Held for Future Use or devoted to utility service? If so, for each sale, describe the property sold; state whether, when and in what manner it had been included in rate base; show the details of how the gain or loss was calculated; indicate when the sale occurred; explain how and whether the Company is amortizing such gain or loss; and show how such amortization was computed.
- A-128. See attached. All property listed has been included in net original cost rate base from the time of purchase through the time of sale. KU is not amortizing any gains or losses associated with these property sales except for the gain on the sale of the Carrollton office, which was accounted for as a sale/leaseback transaction. No sales of property have been forecasted in the test year.

Attachment to Response to AG-1 Question No. 128 Page 1 of 1 Scott

Kentucky Utilities Company Property Sold During the Test Year and Preceeding 2 Years

		Calculation of Gain or Loss					\$
			Net		Net	Ga	in/(Loss)
Description	Dates	Bo	<u>ok Value</u>		<u>Cash</u>	\mathbf{A}	<u>mounts</u>
Vehicles	Nov-2015	\$	-	\$	2,115	\$	2,115
Morganfield Storeroom Land	Nov-2015		21,692		54,444		32,752
Vehicles	Apr-2016		-		16,751		16,751
	Jul-2015 to						
Deferred Gain on Carrollton Sale/Leaseback *	Dec-2016		-		-		6,572
						\$	58,190

*See deferred gain calculation

Attachment to Response to AG-1 Question No. 128 Page 2 of 2 Scott

Kentucky Utilities Company *Deferred Gain Calculation of Carrollton Sale/Leaseback

Sale proceeds (sold July 31, 2006) Rent reduction received as part sale/lease agreement	\$	198,245 75,000 273,245
Original cost of assets on property records		203,898
Accumulated depreciation		(77,039)
Net book value		126,859
Gain on transaction	\$	146 297
Gain on transaction	•	146,387
Gain deferred and recognized over life of the lease (PV of		
minimum lease pmts)	\$	74,478
Gain recognized at time of sale		71,909
Gain on transaction	\$	146,387
Colin defense dans dans and encouling dans a life of the large (DV of		
Gain deferred and recognized over life of the lease (PV of	¢	74 479
minimum lease pmts)	\$	74,478
Total months in 17 year lease term		204
Monthly deferred gain amount		365
Monthly periods in year		12
Yearly amount	\$	4,381

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 129

- Q-129. The following questions are related to the Company's policies regarding accounting for CWIP, plant in service and depreciation:
 - a. For each item of CWIP which the Company has transferred into utility plant in service for purposes of this filing, has a full 12 months of depreciation expense been included in the cost of service?
 - b. For each item of CWIP which the company has transferred into utility plant in service for the purposes of this filing, has an amount representing a full 12 months of depreciation expense been added to the total accumulated depreciation by which rate base is reduced?
 - c. Provide the same information as requested in subsection b. above for the deferred taxes related to the depreciation timing differences.
- A-129. a. No, depreciation expense is not annualized. Depreciation begins when the plant is placed in service using the mid-month convention.
 - b. See the response to part a.
 - c. See the response to part a.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 130

Responding Witness: Lonnie E. Bellar

- Q-130. List all revenue, expense, and rate base amounts by account included in the test year relating to any Company or affiliate owned or leased airport, airplane, and helicopter facilities, if applicable.
- A-130. Helicopter hanger facility expense (account 563) is \$2,520 (Total KU Company). This expense is for the hanger where the helicopter that is used for aerial patrol and inspection of the transmission lines is stored.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 131

Responding Witness: Lonnie E. Bellar

- Q-131. Has the Company included any amounts in its requested cost of service for affiliate owned or leased aircraft? If so, provide the following information:
 - a. the amount of expense in the test year by account.
 - b. the amount in the projected period through June 30, 2018 by account.
 - c. flight logs for all affiliate owned or leased aircraft for 2015 and 2016.
- A-131. Yes, KU leases a helicopter for aerial patrol and inspection of transmission lines.
 - (a) Base Year (account 563) \$279,188 (Total KU Company).
 - (b) Forecasted Test Year (account 563) \$290,340 (Total KU Company).
 - (c) See attached.

Billing Item Description	Flight Hours	Date	Company
Hourly Equip Rate per Fl Hr (Helo)	2.9	1/24/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.3	1/31/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	6.7	2/17/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.9	2/22/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	2/23/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	3/8/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.7	3/16/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.7	3/17/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.3	3/18/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.4	3/20/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.9	3/23/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.8	3/24/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	6.7	3/25/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	3/27/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.3	3/30/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	3/31/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	4/1/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.3	4/4/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	4/9/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	4/13/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.3	4/24/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	4/28/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.2	5/4/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.8	5/5/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.7	5/6/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.2	5/8/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.3	5/11/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.2	5/21/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	6.2	5/22/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.5	5/29/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.3	6/3/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	6/4/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.7	6/5/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.3	6/11/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.4	6/15/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	7	6/16/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	6	6/17/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.6	6/26/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.6	6/29/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.1	7/1/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	6.9	7/9/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	1.6	7/10/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	7/14/2015	KU
· · · · · · ·			

Billing Item Description	Flight Hours	Date	Company
Hourly Equip Rate per Fl Hr (Helo)	1.1	7/15/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.5	7/21/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.3	7/24/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3	7/26/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5	7/31/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5	8/3/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	1.1	8/4/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.8	8/7/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.5	8/10/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.7	8/11/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.3	8/12/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.3	8/13/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	8/14/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	8/17/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.2	8/20/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	8/21/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.9	8/25/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.2	8/31/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.8	9/2/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.5	9/8/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.9	9/14/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.4	9/16/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.9	9/18/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.3	9/23/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	1.5	9/25/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.2	9/27/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.3	10/6/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.9	10/22/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.4	10/30/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.4	11/5/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	11/11/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	11/13/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	1.4	11/17/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.5	11/25/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	1.2	12/10/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	5.9	12/11/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.7	12/15/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	4.4	12/16/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	2.7	7/16/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	3.5	9/21/2015	KU
Hourly Equip Rate per Fl Hr (Helo)	0	1/1/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	2.3	1/8/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	1.2	1/10/2015	Flight was for both KU & LG&E

Billing Item Description	Flight Hours	Date	Company
Hourly Equip Rate per Fl Hr (Helo)	2.5	1/11/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	2.6	1/13/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	0	1/19/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	0.2	1/23/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	0	3/29/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	1.9	6/18/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	6.3	7/28/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	5.2	8/26/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	8	8/27/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	1.5	8/28/2015	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	8.4	9/3/2015	Flight was for both KU & LG&E

Billing Item Description	Flight Hours	Date	Company
Hourly Equip Rate per Fl Hr (Helo)	2.8	1/24/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2	1/25/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.2	3/4/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	3/6/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	3/6/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3	3/7/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	3/8/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.6	3/9/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.4	3/18/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	3/23/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	3/29/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	4/1/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.1	4/9/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.3	4/13/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	6.2	4/14/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5.2	4/15/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.5	4/20/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.4	4/28/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.6	4/29/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.2	5/11/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.7	5/13/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.5	5/13/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.2	5/18/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.1	5/27/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.4	5/29/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.8	5/31/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5	6/2/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.9	6/3/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5.1	6/10/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	6/20/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	6/21/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.6	6/23/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.5	6/23/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	6/24/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1	6/24/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.3	6/27/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.8	6/28/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	7/19/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5.4	7/21/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	7/25/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.3	7/29/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.8	8/2/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.9	8/4/2016	KU
	115	3, 1, 2020	

Billing Item Description	Flight Hours	Date	Company
Hourly Equip Rate per Fl Hr (Helo)	4.3	8/8/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.7	8/10/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	8/11/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	8/22/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.6	9/8/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	9/12/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.7	9/13/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5.6	9/14/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	9/16/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.7	9/23/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.3	10/19/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	10/26/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	1.5	10/27/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	10/28/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.1	10/31/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	5.8	11/1/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.6	11/2/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	11/3/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.3	11/8/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.9	11/17/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.4	11/18/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.7	11/19/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	3.8	12/13/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	2.5	12/22/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.7	12/27/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4	3/30/2016	KU
Hourly Equip Rate per Fl Hr (Helo)	4.2	5/19/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	3.9	8/29/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	4.1	8/30/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	3.1	8/31/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	2.5	8/31/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	4	9/1/2016	Flight was for both KU & LG&E
Hourly Equip Rate per Fl Hr (Helo)	2.9	9/2/2016	Flight was for both KU & LG&E

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 132

Responding Witness: Valerie L. Scott

- Q-132. Identify how much of the Company's materials and supplies balance at December 31, 2014, December 31, 2015, and December 31, 2016 is related to construction activities.
- A-132. Materials and supplies specifically purchased for a capital project are charged directly to that project. The items in the materials and supplies balance are not related to any specific construction activities.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 133

- Q-133. Provide a copy of the parent company's corporate federal tax returns and supporting "M" schedules and all consolidating schedules for tax years 2014 and 2015.
- A-133. The parent company's 2014 and 2015 pro forma federal tax returns are attached. The information requested is confidential and proprietary, and is being provided under seal pursuant to a petition for confidential treatment.

Attachments Confidential

The entire attachments are Confidential and provided separately under seal.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 134

Responding Witness: Christopher M. Garrett

- Q-134. Provide workpapers detailing the calculation of each statutory addition and deduction used in arriving at taxable income in the above calculation, as well as the calculations provided in the filing. Also provide a narrative explanation of the effect of each statutory addition and deduction on tax and/or book income, and the Internal Revenue Code Section or Treasury Regulation calling for the adjustment.
- A-134. The question references "taxable income in the above calculation" as a result the answer provided is for tax years 2014 and 2015 that was asked for in preceding question, Q-133, as well as the calculations provided in the filing.

The 2014 and 2015 workpapers, as well as the calculations provided in the filing, detailing the calculation to arrive at taxable income are provided under seal. The information requested is confidential and proprietary, and is being provided under seal pursuant to a petition for confidential protection.

A comprehensive narrative explanation of the effect of each statutory addition and deduction on tax and/or book income does not exist; however, a summary explanation of our book vs. tax differences is provided. The information requested is confidential and proprietary, and is being provided under seal pursuant to a petition for confidential protection. Also, there is no readily available comprehensive listing of each adjustment that references either the applicable Internal Revenue Code Section or Treasury Regulation.

Attachments Confidential

The entire attachments are Confidential and provided separately under seal.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 135

Responding Witness: Christopher M. Garrett

- Q-135. For tax years 2014 and 2015, provide a copy of the parent company and KU's Kentucky Corporate Income Tax Return and all other Kentucky Tax Returns. If separate returns were not prepared, provide the detailed worksheets that were used to prepare the consolidated return.
- A-135. The parent company's 2014 and 2015 pro forma Kentucky tax returns and KU's 2014 pro forma Kentucky tax return are attached. The information requested is confidential and proprietary, and is being provided under seal pursuant to a petition for confidential treatment.

KU's 2015 pro forma Kentucky income tax return was filed in this case as Response to PSC 1-48(a)(9).

Other routine non-income tax Kentucky returns such as monthly Sales/Use tax returns, quarterly payroll tax returns, and property tax returns can be provided or are available for review upon request.

Attachments Confidential

The entire attachments are Confidential and provided separately under seal.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 136

Responding Witness: Christopher M. Garrett

Q-136. Provide the following information regarding deferred income taxes (DFIT):

- a. Calculation of all timing differences reflected in DFIT; show book amount and tax amount; indicate when amounts were included in book and in tax returns;
- b. Tax rate applied to each timing difference;
- c. Calculation of actual DFIT;
- d. If different, reconcile book amount per cost of service and book amount in DFIT calculation. Identify and quantify all reconciling items.
- e. For each year 2015 and 2016, identify the gross and net additions to deferred taxes. Breakdown such additions within each year by sub-account, providing the number and name for each account and sub-account. For each item by year, reconcile the gross to net additions and explain how that reconciliation was derived.
- f. For 2016 provide information requested in (e) above for each month.

A-136.

- a. The net differences are listed on the attached as separate book and tax amounts are not readily available for the test year.
- b. See the response to part a.
- c. See response to part a.
- d. The book amounts used for the cost of service study and the book amounts used for deferred tax calculations are the same. The cost of service study does not use the book amounts after net operating income.

- e. See attached for the listing of sub-account amounts during 2015 and 2016. The Company does not maintain deferred tax records for gross or net additions, therefore no reconciliation is provided.
- f. See attached for the listing of sub-account amounts by month for 2016. The Company does not maintain deferred tax records for gross or net additions, therefore no reconciliation is provided.

Kentucky Utilities Company Case No. 2016-00370 Deferred Income Tax Expense - Total Company 12ME 6/30/18

	Federal Timing			State Timing			Federal Benefit		
	Differences	Tax Rate	DFIT	Difference	Tax Rate	DFIT	(Tax Rate)	DFIT	TOTAL DFIT
Addbacks to Book Income:									
Book Depreciation	298,357,675	35%	104,425,186	298,357,675	6%	17,901,461	-35%	(6,265,511)	116,061,136
CIAC	4,000,000	35%	1,400,000	4,000,000	6%	240,000	-35%	(84,000)	1,556,000
Fuel Adjustment Clause Refund & Recovery	553,063	35%	193,572	553,063	6%	33,184	-35%	(11,614)	215,142
Green River Regulatory Asset	1,702,458	35%	595,860	1,702,458	6%	102,147	-35%	(35,752)	662,256
Interest Capitalized	10,086,987	35%	3,530,445	10,086,987	6%	605,219	-35%	(211,827)	3,923,838
Interest Rate Swaps	958,060	35%	335,321	958,060	6%	57,484	-35%	(20,119)	372,685
Loss on Reacquired Debt - Amortization	679,155	35%	237,704	679,155	6%	40,749	-35%	(14,262)	264,191
Muni True-Up Regulatory Liability	5,323,395	35%	1,863,188	5,323,395	6%	319,404	-35%	(111,791)	2,070,801
Off System Sales Tracker	10,889	35%	3,811	10,889	6%	653	-35%	(229)	4,236
Regulatory Expense	681,081	35%	238,378	681,081	6%	40,865	-35%	(14,303)	264,941
Research and Demonstration Site	324,324	35%	113,513	324,324	6%	19,459	-35%	(6,811)	126,162
Storm Damages	6,179,640	35%	2,162,874	6,179,640	6%	370,778	-35%	(129,772)	2,403,880
Total	328,856,727		115,099,854	328,856,727		19,731,404		(6,905,991)	127,925,267
Deducts from Book Income:									
ARO CCR	32,225,116	35%	11,278,791	32,225,116	6%	1,933,507	-35%	(676,727)	12,535,570
Bonus Depreciation - Federal	216,560,360	35%	75,796,126	-	6%	-	-35%	-	75,796,126
Cost of Removal	21,950,214	35%	7,682,575	21,950,214	6%	1,317,013	-35%	(460,954)	8,538,633
Demand Side Management (DSM)	1,416,427	35%	495,749	1,416,427	6%	84,986	-35%	(29,745)	550,990
Environmental Cost Recovery	3,163,659	35%	1,107,281	3,163,659	6%	189,820	-35%	(66,437)	1,230,663
FAS 106 Post Retirement Benefits	5,965,784	35%	2,088,024	5,965,784	6%	357,947	-35%	(125,281)	2,320,690
Federal NOL Utilization	48,183,099	35%	16,864,085	-	6%	-	-35%	-	16,864,085
Miso Exit Fees/Transmission Tariff	8,949	35%	3,132	8,949	6%	537	-35%	(188)	3,481
Non-Deductible Pensions	2,835,085	35%	992,280	2,835,085	6%	170,105	-35%	(59,537)	1,102,848
Over/Under Collections-Va	714,333	35%	250,017	714,333	6%	42,860	-35%	(15,001)	277,876
Refined Coal	215,461	35%	75,411	215,461	6%	12,928	-35%	(4,525)	83,814
Repair Allowance	30,000,000	35%	10,500,000	30,000,000	6%	1,800,000	-35%	(630,000)	11,670,000
Tax Depreciation	300,354,469	35%	105,124,064	455,174,794	6%	27,310,488	-35%	(9,558,671)	122,875,881
Total	663,592,956		232,257,535	553,669,822		33,220,189		(11,627,066)	253,850,658

Deferred Tax (Expense) Benefit

(125,925,391)

Reconciling Items:	
Federal Excess Deferred Income Taxes	557,692
State Excess Deferred Income Taxes	392,308
Investment Tax Credit Amortization ¹	1,931,461
Basis Adjustment - Federal	(615,123)
Basis Adjustment - State	(106,506)
R&E Credit - Federal	200,000
Total Deferred Tax (Expense) Benefit after reconciling items	(123,565,560)

¹ Investment Tax Credit Amortization is recorded below-the-line for Kentucky Utilities Company.

Kentucky Utilities Company Case No. 2016-00370 Accumulated Deferred Income Taxes

Account	Account Description	DEC-2015	DEC-2016
190007	FASB 109 ADJ-FED	30,603,230	31,509,658
190008	FASB 109 GRS-UP-FED	23,149,983	23,106,862
190009	FASB 109 ADJ-STATE	5,581,136	5,746,442
190010	FASB 109 GRS-UP-ST	4,221,881	4,214,017
190415	DTA FEDERAL - NON-CURRENT	262,402,748	223,764,667
190615	DTA STATE - NON-CURRENT	33,999,743	25,348,593
190616	DTA ON FIN 48 - UTP - STATE	(1,920,066)	-
282007	FASB 109 ADJ-FED PRO	(36,425,347)	(37,087,473)
282009	FASB 109 ADJ-ST PROP	487,604	25,129
282503	DTL ON FIXED ASSETS	(1,100,828,819)	(1,143,578,630)
282703	DTL ON FIXED ASSETS - STATE (NON-CURRENT)	(135,541,829)	(143,058,220)
283011	FASB 109 GR-UP-F-OTH	(23,017,186)	(23,002,532)
283012	FASB 109 GR-UP-S-OTH	(4,197,663)	(4,194,991)
283515	DTL FEDERAL - NON-CURRENT	(88,891,729)	(112,510,437)
283715	DTL STATE - NON-CURRENT	(16,211,258)	(20,518,621)
Total	SUM	(1,046,587,570)	(1,170,235,533)

Attachment to Response to AG-1 Question No. 136(e) Page 1 of 1 Garrett

Kentucky Utilities Company Case No. 2016-00370 Accumulated Deferred Income Taxes

Account	Account Description	JAN-2016	FEB-2016	MAR-2016	APR-2016	MAY-2016	JUN-2016	JUL-2016	AUG-2016	SEP-2016	OCT-2016	NOV-2016	DEC-2016
190007	FASB 109 ADJ-FED	30,603,230	30,603,230	30,451,380	30,451,380	30,451,380	31,615,530	31,615,530	31,615,530	31,463,680	31,463,680	31,463,680	31,509,658
190008	FASB 109 GRS-UP-FED	23,149,983	23,149,983	22,905,229	22,905,229	22,905,229	23,498,321	23,498,321	23,470,421	23,225,667	23,225,667	23,225,667	23,106,862
190009	FASB 109 ADJ-STATE	5,581,136	5,581,136	5,553,443	5,553,443	5,553,443	5,765,750	5,765,750	5,765,750	5,738,057	5,738,057	5,738,057	5,746,442
190010	FASB 109 GRS-UP-ST	4,221,881	4,221,881	4,177,245	4,177,245	4,177,245	4,285,408	4,285,408	4,280,320	4,235,684	4,235,684	4,235,684	4,214,017
190415	DTA FEDERAL - NON-CURRENT	262,402,748	262,402,748	252,480,469	252,480,469	258,092,444	262,201,449	262,201,449	254,195,652	209,986,412	209,986,412	209,986,412	223,764,667
190615	DTA STATE - NON-CURRENT	33,999,743	33,999,743	34,158,940	34,158,940	34,535,823	32,720,566	32,720,566	32,585,269	24,477,634	24,477,634	24,477,634	25,348,593
190616	DTA ON FIN 48 - UTP - STATE	(1,920,066)	(1,920,066)	(1,920,066)	(1,920,066)	(1,920,066)	-	-	-	-	-	-	-
282007	FASB 109 ADJ-FED PRO	(36,425,347)	(36,425,347)	(36,407,618)	(36,407,618)	(36,386,226)	(37,048,471)	(37,048,471)	(37,077,204)	(37,044,272)	(37,044,272)	(37,044,272)	(37,087,473)
282009	FASB 109 ADJ-ST PROP	487,604	487,604	407,973	407,973	411,874	208,235	208,235	192,731	115,872	115,872	115,872	25,129
282503	DTL ON FIXED ASSETS	(1,100,828,819)	(1,100,828,819)	(1,124,778,087)	(1,124,778,087)	(1,137,034,899)	(1,149,103,222)	(1,149,103,222)	(1,138,846,693)	(1,132,340,136)	(1,132,340,136)	(1,132,340,136)	(1,143,578,630)
282703	DTL ON FIXED ASSETS - STATE (NON-CURRENT)	(135,541,829)	(135,541,829)	(139,155,241)	(139,155,241)	(140,942,945)	(142,015,844)	(142,015,844)	(142,079,001)	(139,364,036)	(139,364,036)	(139,364,036)	(143,058,220)
283011	FASB 109 GR-UP-F-OTH	(23,017,186)	(23,017,186)	(22,902,441)	(22,902,441)	(22,888,822)	(23,206,990)	(23,206,990)	(23,202,909)	(23,078,485)	(23,078,485)	(23,078,485)	(23,002,532)
283012	FASB 109 GR-UP-S-OTH	(4,197,663)	(4,197,663)	(4,176,737)	(4,176,737)	(4,174,253)	(4,232,278)	(4,232,278)	(4,231,534)	(4,208,842)	(4,208,842)	(4,208,842)	(4,194,991)
283017	DEF INC TAX - FED EST	-	-	-	-	-	-	-	(3,356)	-	-	(3,356)	
283018	DEF INC TAX - ST EST	-	-	-	-	-	-	-	(612)	-	-	(612)	
283515	DTL FEDERAL - NON-CURRENT	(88,891,729)	(88,891,729)	(94,666,093)	(94,666,093)	(103,720,656)	(105,367,917)	(105,367,917)	(105,367,917)	(109,094,788)	(109,094,788)	(109,094,788)	(112,510,437)
283715	DTL STATE - NON-CURRENT	(16,211,258)	(16,211,258)	(17,264,333)	(17,264,333)	(18,915,621)	(19,216,033)	(19,216,033)	(19,216,034)	(19,895,706)	(19,895,706)	(19,895,706)	(20,518,621)
Total	SUM	(1,046,587,570)	(1,046,587,570)	(1,091,135,937)	(1,091,135,937)	(1,109,856,050)	(1,119,895,496)	(1,119,895,496)	(1,117,919,586)	(1,165,783,259)	(1,165,783,259)	(1,165,787,227)	(1,170,235,533)

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 137

- Q-137. State whether the Company has or will claim bonus tax depreciation on its federal or state tax return for 2016 and if so, list the KU 2016 plant additions by account and amount that are expected to qualify for 2016 bonus tax depreciation.
 - a. Also, show the estimated impact on test year ADIT from 2016 bonus tax depreciation.
 - b. If not included in its filing, specify the expected test year jurisdictional revenue requirement impact of including bonus tax depreciation allowance in the Company's overall cost of service for qualified property placed into service by June 30, 2018.
 - c. Provide all of the adjustments that would be necessary to produce the Company's test year jurisdictional revenue requirements that include the impact of bonus tax depreciation for qualified property placed in service prior to June 30, 2018, summarized for all applicable rate base and expense categories presented in the Company's Filing Requirements schedules.
 - d. The adjustments referenced in part b., above should allow for a complete assessment of the revenue requirement impact of inclusion of bonus tax depreciation on plant additions through June 30, 2018 in the overall cost-of-service. As part of this response, include all electronic workpapers with formulas intact used in the derivation of the bonus tax depreciation impact.
- A-137. The Company will claim bonus tax depreciation on its federal tax return for 2016. The states in which KU files income tax returns do not conform to the federal treatment of bonus tax depreciation; therefore no state bonus tax depreciation can be claimed. Attached is a listing of plant additions expected to qualify for 2016 bonus tax depreciation.
 - a. The estimated bonus tax depreciation deduction of \$180,410,883 for 2016 increases the Company's ADIT liability by \$63,143,809. This will ultimately reverse over the book life of the qualifying assets.

- b. Bonus tax depreciation was included in the filing.
- c. Not applicable.
- d. Not applicable.

Kentucky Utilities Company Case No. 2016-00370 Qualifying Additions - Bonus Depreciation 2016 Provision

Tax Class Account	Plant Addition Amount
BROWN 1 Total	686,608.43
BROWN 11 Total	89,706.74
BROWN 2 Total	710,149.03
BROWN 3 Total	109,586,338.41
BROWN 6 Total	(962.12)
BROWN 7 Total	(962.07)
BROWN 8 Total	44,189.81
BROWN 9 Total	221,640.04
BROWN SOLAR Total	14,473,544.97
CANE RUN 7 NGCC Total	(383,625.86)
COMPUTER EQ Total	4,067,593.61
DISTRIBUTION Total	
E STM GENERAL Total	78,148,746.55
	152,643.59
E STM PROD TRIMBLE 2 Total	12,509,440.11
E STM PROD TRIMBLE 2 SO2 Total	17,436.11
GENERAL OTHER Total	5,758,447.04
GHENT 1 Total	8,784,543.19
GHENT 2 Total	8,394,719.29
GHENT 3 Total	8,226,207.32
GHENT 4 Total	17,302,663.68
GR RIVER 4 Total	43,754.07
HYDRO Total	41,581.54
MISC INTANGIBLE Total	11,706,442.76
OFFICE EQ Total	1,515,880.88
OTHER PRODUCTION Total	10,031.66
PADDY'S RUN 13 Total	6,796,850.16
PC GH1 SCRUBBER Total	331,909.96
PC GH2 SCRUBBER Total	580,743.20
PC GH3 SCRUBBER Total	591,216.56
SMART METERS & GRIDS Total	300,884.68
Street Lighting Total	3,293,944.93
TRANSMISSION Total	55,908,192.95
TRANSPORTATION Total	1,979,532.34
TRIMBLE 10 Total	369,995.01
TRIMBLE 5 Total	330,532.23
TRIMBLE 6 Total	3,543,978.34
TRIMBLE 7 Total	(105,796.48)
TRIMBLE 8 Total	178,150.40
TRIMBLE 9 Total	729,163.05
VA DISTRIBUTION Total	3,090,331.47
VA GENERAL OTHER Total	67,996.43
VA Street Lighting Total	181,346.02
VA TRANSMISSION Total	546,035.39
Grand Total	360,821,765.42
50% Deduction	500,021,705.42
Bonus Tax Depreciation	180,410,882.71
Bonus Las Depretation	100,410,002.71

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 138

- Q-138. Does KU's filed rate base reflect impacts from bonus tax depreciation for plant additions made in 2016 and projected to be made in 2017 and in 2018 (through June 2018)?
 - a. If not, explain why not.
 - b. If so, identify the amounts and show how they were calculated.
- A-138. Yes, the Company's filed rate base reflects impacts from bonus tax depreciation for plant additions in 2016 as well as projected additions in 2017 and 2018.
 - a. Not applicable.
 - b. See attached.

Kentucky Utilities Company Case No. 2016-00370 Bonus Depreciation \$ Thousands

	2016 ¹	2017	2018 (spend in 2017)	2018 (spend in 2018)	Test Year
Plant Additions	507,615	354,004	224,912	487,893	
% of Closing Eligible for Bonus ²	89%	85%	100%	87%	
Amount Eligible for Bonus	450,747	301,741	224,912	424,486	
Federal Bonus Tax Depreciation %	50%	50%	50%	40%	1/2 of 2017 plus 1/2 of 2018
Federal Bonus Tax Depreciation	225,373	150,870	112,456	169,794	216,560

1 Represents the estimated amount of 2016 bonus tax depreciation at the time of filing.

2 Plant Additions that do not qualify for bonus tax depreciation include; Land, Structures, and additions that qualified for tax repairs expensing.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 139

Responding Witness: Valerie L. Scott

- Q-139. List the name and business function of all Company subsidiaries and affiliates and separately list those which are included in this case, and which charged cost to KU during 2015 and 2016.
- A-139. KU is the only entity included in this case.

See the response to PSC 1-2 for the names and business functions of PPL subsidiaries and affiliates which had transactions with or charged costs to KU during 2015 and 2016.

See attached for a complete list of all of the Company's subsidiaries and affiliates.

PPL CORPORATION SUBSIDIARIES AND AFFILIATES

Airborne Clean EnergyLtd. Airborne Pollution Control, Inc. Aztec Insurance Limited **Central Networks Trustees Limited** CEP Commerce, LLC CEP Lending, Inc. CEP Reserves, Inc. **DCUSA** Limited DHA. LLC Downtown Commercial Loan Fund, LLC Ebusiness South West Limited Electralink Limited Electric Energy, Inc. **Electricity Pensions Limited Electricity Pensions Trustee Limited** Energy Networks Association Limited FCD LLC GemservLimited Hyder Limited Hyder Profit Sharing Trustee Limited Hyder Share Scheme Trustee (2) Limited Hyder Share Scheme Trustee Limited Indiana-Kentucky Electric Corporation Infralec 1992 Pension Trustee Limited Joppa & Eastern Railroad Company **Kelston Properties Limited** Kelston Properties 2 Limited Kentucky Utilities Company Lexington Utilities Company LG&E and KU Capital LLC LG&E and KU Energy LLC LG&E and KU Foundation Inc. LG&E and KU Hvdro I LLC LG&E and KU Services Company LG&E Energy Inc. LG&E Energy Marketing Inc. Louisville Development Bancorp, Inc. Louisville Gas and Electric Company Merchants Landing (Amenities) Limited Met-South. Inc. Meter Operator Services Limited Meter Reading Services Limited Metro Bank, Inc. Midwest Electric Power, Inc. MRA Service CompanyLimited Northmere Limited Ohio Valley Electric Corporation PMDC Chile. LLC PMDC International Holdings, Inc. PP&L Residual Corporation PPL (Barbados) SRL PPL Capital Funding, Inc. PPL Cayman, LLC **PPL Electric Utilities Corporation** PPL Energy Funding Corporation

PPL EU Services Corporation **PPL** Foundation PPL Global, LLC PPL Infrastructure Services, LLC PPL Island Limited PPL Midlands Limited PPL Power Insurance Ltd. **PPL Services Corporation** PPL Strategic Development, LLC PPL TransLink. Inc. PPL UK Holdings, LLC PPL UK Investments Limited PPL UK Management Partners PPL UK Resources Limited PPL UK Distribution Holdings Limited PPL WEM Limited PPL WPD Limited Smart Energy Code Company Limited South Wales Electricity Share Scheme **Trustees Limited** South Western Helicopters Limited Spinnaker Quay Management Company Limited Surf Telecoms Limited The Ombudsman Service Limited Victory Park Management Company Limited Western Kentucky Energy Corp. Western Power Distribution (East Midlands) plc Western Power Distribution (West Midlands) plc Western Power Distribution (South Wales) plc Western Power Distribution (South West) plc Western Power Distribution Investments Limited Western Power Distribution plc Western Power Generation Limited Western Power Pension Trustee Limited Willow Farm Management Company Limited WPD Foundation WPD Investments Limited WPD Limited WPD Limited (Guernsev) WPD Midlands Networks Contracting Limited WPD Midlands Properties Limited WPD Distribution Networks Holdings Limited WPD Property Developments Limited WPD Property Investments Limited WPD Property Limited WPD Share Scheme Trustees Limited WPD Smart Metering Limited WW Share Schemes Trustees Limited

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 140

- Q-140. Provide a detailed derivation of 2014, 2015 and 2016 research and development credits, including:
 - a. A list of all research, development and experimentation expenditures, and for each item provide;
 - b. Separately the amounts payable to inside and outside contractors;
 - c. The amount payable in the test year;
 - d. The total expenditures to be expensed in determining federal taxable income; and
 - e. The total expenditures qualifying for the R & E credit under I.R.C. paragraph 44f.
- A-140. a. e. See attached.

KENTUCKY UTILITIES COMPANY CASE NO. 2016-00370 R&E Credit Analysis

		2014 KU	2015 KU
a. & b.	Outside Contractors(No Inside Contractors)		
	EPRI	2,774,028	2,687,272
	Nonqualified EPRI 50% Adjustment Per Agreement With IRS	(1,387,014)	(1,343,636)
	University of Georgia Tech Research	28,670	34,615
	University of Texas (Luminant Carbon Management Program)	45,750	97,050
	University Of Louisville	12,500	-
	Outside Engineering/Studies	-	23,328
	Carbon Sequestration Council	-	12,600
	University Of Kentucky Research Foundation	-	102,440
a. & b.	Inside and Outside Contractors QRE's	1,473,934	1,613,668
с.	Amount Payable In Test Period - \$1,538,462		
d.	Total Expenditures to be Expensed In Determining Federal Taxable Income	1,473,934	1,613,668
R&E	Credit Computation		
	Qualifying Research Expenditures per above	1,473,934	1,613,668
	280C Reduced Credit Deduction Percentage	13%	13%
	Reduced Credit Allowed	191,611	209,777

e. Section 44f has been deleted from the I.R.C. and could not be referenced.

1 Note: Election was made under I.R.C. code section 280C for a reduced credit. Not making this election would have required an addback of 35% of the Amount in d. 2 2016 Return has not been completed. Amounts included in test period above are estimates.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 141

- Q-141. In tax years 2014 or 2015, did the Company claim any tax deductions under section 174 of the Internal Revenue Code? If so, identify and explain each deduction claimed under section 174.
- A-141. Kentucky Utilities Company did not claim tax deductions under section 174, Research and Experimental Expenditures, for tax years 2014 or 2015.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 142

Responding Witness: Christopher M. Garrett

- Q-142. Identify all net operating loss carrybacks and carryforwards for KU for each tax year 2014 through 2016, and show in detail how KU has accounted for those on its books.
- A-142. For tax year 2014 the Company had a federal net operating loss of (\$203,827,103). \$174,729,566 of that loss was carried back to offset taxable income on its 2013 federal tax return resulting in a net operating loss carryforward of (\$29,097,537).

For tax year 2015 the Company had a federal net operating loss of (\$311,606,771). There was no available taxable income to offset on prior year federal tax returns resulting in a net operating loss carryforward of (\$340,704,308) [\$29,097,537 + \$311,606,771].

For tax year 2016 the Company is projected to have federal taxable income of \$113,836,242. Loss carryforwards will be utilized to offset the taxable income resulting in a net operating loss carryforward of (\$226,868,066) [\$340,704,308 - \$113,836,242].

A 79,403,823 ($226,868,066 \times 35\%$) deferred tax asset has been recorded on the Company's books as of 12/31/16.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 143

- Q-143. Provide detailed descriptions of any IRS audit, settlements with the Internal Revenue Service, or audit adjustments made during the three years ending December 31, 2016.
- A-143. During the last three years ending December 31, 2016, the Company has recorded one adjustment due to the completion of its 2011 IRS audit in 2014. The adjustment was a 50% reduction on qualifying expenditures for the R&E credit, which reduced the credit by \$136,743. Tax years 2012 through 2015 are not currently under examination. The 2016 federal tax return has not yet been prepared; this return will be filed before September 15, 2017.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 144

Responding Witness: Christopher M. Garrett

- Q-144. Provide a copy of any and all revenue ruling requests, IRS responses, and correspondence between the Company and the IRS during the ten years ending December 31, 2016.
- A-144. Kentucky Utilities Company has not made any requests for IRS income tax revenue rulings during the ten years ending December 31, 2016.

The Company does have routine correspondence with the IRS in dealing with payroll matters, employee benefits, income tax audits, tax payments/refunds, and other miscellaneous federal tax matters. Correspondence of this nature is available upon request or for inspection at the Company's offices.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 145

- Q-145. List total property taxes and property tax refunds or abatements each year, for the test year and the most recent three calendar years, 2014 through 2016. Describe and show the accounting treatment accorded to each item, showing journal entries, dates, accounts, amounts, and descriptions.
- A-145. See attached.

Kentucky Utilities Company Case No. 2016-00370 Property Taxes

Account	Description	2014	2015	2016	Test Year
408.1	Property Tax Expense	24,117,120	25,648,373	26,867,007	29,910,219
408.2	Property Tax Expense	10,715	10,827	10,605	-
107	Construction Work in Progress		215,457	494,580	573,263

There were no abatements during the three years ending December 31, 2016 or the test year. See Question No. 147 for property tax refunds.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 146

- Q-146. List all amounts of property taxes under dispute at December 31, 2016, and indicate the tax year and the taxing district to which each relates.
- A-146. As of December 31, 2016, the Company had no property taxes under dispute.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 147

- Q-147. List all property tax refunds, by geographical area and taxing authority, by year, received in the most recent three years through 2016.
- A-147. No property tax refunds were received by KU in years 2014 through 2016.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 148

- Q-148. State whether any settlements, penalties or interest resulting from audits by taxing authorities are included in expense per books in the test year either as incurred by the Company or as charged to KU by an affiliate. If so, provide full details including the periods and issues resolved, the dollar amounts of settlement by issue, the taxing authority penalty or interest by issue, the taxing authority involved, the date of settlement, the current status of the payment, and the final resolution of the matter or status of the protest if unresolved.
- A-148. There have been no settlements, penalties or interest resulting from audits by taxing authorities included in the forecasted test year.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 149

Responding Witness: John J. Spanos

- Q-149. Provide hard copies of all workpapers underlying the Depreciation Study. Provide Excel files for all portions of the Depreciation Study that were prepared using Excel.
- A-149. All workpapers have been supplied electronically underlying the Depreciation Study. All Excel files have been supplied electronically in Excel format.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 150

Responding Witness: John J. Spanos

- Q-150. Provide all notes taken during any meetings or site visits regarding the depreciation study. Identify by name and title all KU personnel who provided the information, and explain the extent of their participation and the information they provided.
- A-150. The attached document sets forth notes taken during meetings regarding the depreciation study.

Attachment to Response to AG-1 Question No. 150 Page 1 of 3 Spanos LISTS /KU GEMERATION MITS-9-29-15 10:00 A.M. D BROWS & MILLCREEK WILL BE INPECTED BY CUEFN POWER PLANT 2) TIME LINE -> = END OF ZOIT (LIPA POWER PLAN 3 Accourant TUPR ON BROWN BY 2022) DIARDET IS TO KNOW RET. DATES BY MID - NOVEMBER ZOIS × 5) 7. HELMERIOS BASED ON TEMP AND ? (USADO) -T NO EFELI RETS (BUSINES) D BROWN GONOS W/ CLOTH POWLER PLAN -7 Factore BROWN 2022 6 SECONDAMY CTS a.) LOUKING INTO TO DETURMINES ANY IMPACT AS A. RESULT OF CLEAR POWER PLAN ? -> No PLAN AT CURRENT TIME -> USED INFREQUENTLY ON PEAK DAYS - TSROWN 6+7 DISPATCHED LAST * La UNITS Stours ITAUN STORETOR CIFE = 2030 or Storning

Attachment to Response to AG-1 Question No. 150 Page 2 of 3 Spanos

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Attachment to Response to AG-1 Question No. 150 Page 3 of 3 Spanos LGE/KJ Elture erunanos - JEDSY - 12/31/15 (Fre wat Ber Arte Cress) to be freed Fine 2015 CATE Youthe 6 (2017 =) That 2018 Due Apair settar - ECR KANT FUSS CCR MUSS for LEWAR AST 1000 COST - FILE 12 DUT. 295 - RETAIN, of LOM RANTS . - Grea Riva figures Lemiouries 11/2015 Artematics to Electron for Toraute No Studies Ans AJA low house and 19425 - FTH 57-01 DETA BY MID SERT SITE VISITS IN OUT Riginiel Alexantos By Nov. 2515 DATA BY GARLY ROWARY HTY FRON BY APRIL 2016 FTY IS APRIL FLE BY JOT 2016

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 151

Responding Witness: John J. Spanos

- Q-151. Identify all plant tours taken during the preparation of the Depreciation Study.
 - a. Identify those in attendance and their titles and job descriptions.
 - b. Provide all conversation notes taken during the tour.
 - c. Provide all photographs and images taken during the tour.
- A-151. a) The following personnel were in attendance during the site visits in preparation of this Depreciation Study.

Name	<u>Title</u>
John J. Spanos	Sr. Vice President
Sara Wiseman	
Eric Riggs	
Ed Clark	
Sam Carr	
Kenneth Hill	
Alex Betz	
Tim Harrison	
Bill Erye	

b-c) The attached document sets forth the notes and photos taken during the site visits.

Attachment to Response to AG-1 Question No. 151 Page 1 of 73 **Spanos** Generalist + Contency 10017-105 12:00 Notty + Scott frank An Com wars work Scrubson No July in Prans BAT LOUD PUT A SLE UN ONE UNVI AT MUL GRADE Brows not BE have is 2024 EFFLUAR LANDATISS A PASSUM AT AL 4.UNTS Ain lows A concern Chen low du forman frag - Bur y Compete 952,000 POWAR - JUNE CAT TO CLOSE (2003) 650 CREWERY USER CONTRETION ALL DRIVED BY CLR LAN PLANT JAN DOWN WILL REDUCE & CLGT PLANTS TE LANDAU MOTION BIL ROSEUR 2 - CCGaTI Anis I al I a reat do you IF ANOWS RISCOND THIS BOTH DOWN AT 2022 NO JINGUS CIEVES CONJONON LUBANDER TO CEPT Sond was to terring Brown 6.7 And Livert 75 42 000 Jow Thongmissing Trans Raigsiviry haw - bus no menuous more Rentwood -2017 Will Jos Mile Fraz /suz) DISTUBUTION N-1 = ADD, UL ROUNDANY FOR SIGTATIONS - June was frame on commen Theory formas Autonotion - Ener Grup Theousant Stites

Attachment to Response to AG-1 Question No. 151 Page 2 of 73 Spanos

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Attachment to Response to AG-1 Question No. 151 Page 4 of 73 Spanos

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Organization	Project	Bud Description	Tyrone 2011	2012	2013	2014 Pa	ge 5 of 73 Spanos	Total
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anization	Project	Bud Description	2011	2012	2013	2014	2015	Total
220	131243	Brown 1,3,FGD, LS - NERC CS IA	\$546,721	\$0	\$0	\$0	\$0	\$546,721
016220	133088	BR FGD Agitator Repl 16	\$0	\$0	\$0	\$0	\$550,000	\$550,000
016220	132584	BR1 SS OHDR Repl 12	\$285,818	\$265,990	\$0	\$0	\$0	\$551,808
016220	142770	BR3-2 BFPT Blade Repl	\$0	\$0	\$574,811	(\$711) \$0	(\$1,398)	\$572,702 \$589,111
016220 016220	124282 BOFFEXP11	BR1 IR & IK Sootblower Repl 12 BR Office Expansion/Renovation	\$585,871	\$3,240 \$284,331	\$0 \$0	\$0 \$0	\$0 \$0	\$589,111 \$599,457
016220	137194	BR Guard Building Replacement	\$315,126 \$0	\$284,531 \$0	\$501,594	\$127,275	\$0 \$0	\$628,869
016220	124280	BR2 E Heater Repl 11	\$633,590	\$0	\$02,554	\$127,275	\$0 \$0	\$633,590
016220	126062	BR1 Primry SH Top Bank Repl	\$033,350 \$0	\$0 \$0	\$0	\$328,169	\$316,913	\$645,082
016220	133907	BR3 IP Blade Repi 12	\$0	\$660,411	\$0	\$0	\$0	\$660,411
016220	126069	BR3-4 Puly Gearbox Rebid 12	\$207,300	\$451,429	\$3,709	\$0	\$0	\$662,438
016220	149862	BR3 Turbine Valve Upgrade	\$0	\$0	\$0	\$0	\$699,816	\$699,816
016220	137179	BR2 SH Platen Repl	\$0	\$0	\$210,682	\$546,517	(\$6,129)	\$751,070
016220	133895	BR3 CWP Overhaul	\$0	\$50,872	\$289,334	\$452,627	\$0	\$792,833
016220	140375	BR3 Spare HWRS Pump	\$0	\$0	\$393,902	\$0	\$403,583	\$797,485
016220	140396	BR2 Turbine Valve Fasteners	\$0	\$0	\$0	\$816,581	\$4,594	\$821,175
016220	139932	BR3 Burner Nozzle Retrofit	\$0	\$0	\$846,121	\$5,221	\$0	\$851,342
016220	137185	BR1 Econ & Hdr Repl	\$0	\$0	\$0	\$461,858	\$562,484	\$1,024,342
016220	133940	BR Software Upgr - Windows 7	\$0	\$0	\$823,264	\$221,196	\$130	\$1,044,590
016220	140395	BR1 Turbine Blading	\$0	\$0	\$0	\$466,359	\$822,248	\$1,288,607
016220	139669	BR1&2 Mercury Mitigation Syst	\$0	\$0	\$1,984,548	\$387,946	\$71,873	\$2,444,367
016220	124212	BR3 Primary SH Repl 12	\$1,081,155	\$1,445,387	(\$12,628)	\$0	\$0	\$2,513,914
016220	133939	BR3 SCR Catalyst	\$0	\$0	\$0	\$511,409	\$2,011,432	\$2,522,841
016220	144455	BR3 Burner Corner Panels	\$0	\$0	\$0	\$0	\$2,839,836	\$2,839,836
01-5220	124249	BR2 Controls Repl 10&11	\$2,884,055	\$5,676	\$0	\$0	\$0	\$2,889,731
20	133938	BR1 Cooling Tower Rebuild	\$0	\$0	\$0	\$1,308,694	\$1,961,254	\$3,269,948
016220	124288	BR3 Generator Rewind 13	\$5,710,020	\$9,991,390	(\$92,034)	\$0	\$0	\$15,609,376
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Organization	Project	Bud Description	2011	2012	2013	2014	2015	Total
016300	123871	BRCT8 HGC Recond 11-12	\$714,046	\$0	\$81,679	\$0	\$0	\$795,725
016300	138357	BRCT GT24 Fuel Flexibility KU	\$0	\$0	\$1,077,307	(\$49,712)	(\$2,616)	\$1,024,979
016300	139117	BRCT11 Rotor Heat Shield Repl	\$0		\$1,138,659	\$0	\$0	\$1,138,659
016300	123909	BRCT 11N2 Controls Upgr 11-12	\$0	\$1,569,067	\$8,402	\$0	\$0	\$1,577,469
016300	123908	BRCT9 Parts Recond 12-13	\$0	\$0	\$0	\$1,360,638	Contraction and the second reserves of	\$2,640,050
016300	123910	BRCT10 C Inspection 12-13	\$0	\$0	\$0	\$1,084,252		\$5,651,892
016300	123907	BRCT9 C Inspection 12-13	\$0	\$1,444,294	\$6,398,026	(\$23,955)	\$0	\$7,818,365
			Dix Dam					
Organization	Project	Bud Description	2011	2012	2013	2014	2015	Total
016910	120418	DX2 JOHNSON VLV REFURB 11	\$644,491	\$258,234	\$0	\$0	\$0	\$902,725
016910	144435	DX Building Refurbishment	\$0	\$0	\$0	\$0	\$1,999,769	\$1,999,769
016910	124213	DX2 Overhaul 11	\$3,988,948	\$423,186	\$0	\$0	\$0	\$4,412,134
016910	122086	DX1 OVERHAUL 11-12	\$1,665,783	\$2,924,099	\$558,683	\$15,068	\$0	\$5,163,633
016910	126823	DX Dam Leakage Remediation	\$8,381,514	(\$1,777)	\$0	\$0	\$0	\$8,379,737
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Organization	Project	Bud Description	2011	2012	2013	2014	2015	Total
016930	124202HF	HF CT Recontrol	\$876,350	\$0	\$0	\$0	\$0	\$876,350

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Attachment to Response to AG-1 Question No. 151 Page 7 of 73 Spanos

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Attachment to Response to AG-1 Question No. 151

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Attachment to Response to AG-1 Question No. 151 Page 9 of 73 **Spanos** CONSIST GENERATIONS STATUS 2:15 ALBY BETE, Tim HAMAISON A UNITS CCRT- Botton AUH LOTT of ulusia ADMINISTRATION BLOC -NON 3 backenson UNIT 1,3 + WITHLED Und 2 Beine Wateria CCAT - 3, SOTIO Fry ASM 60 To LAND Fre Borton ATM GYPIUM LAND FUL NEW Scrubbon - 2007 To 2010 LINGTONE PAR BULDISE - 2010 CHAMBING REEDEN WATON THOMMANT ROW, MENONTS - NEW ELG MISED 12-18 MOUTOR CHEWS FOR OVERHAUS BATO LOND UNITS TURS, JE DICHTANLY US 7-8 445 CHUS Expert A ANON III of Lovo Fin (CUREARAN HOW & RUSS IN JONICO) BULDISC COAL YAND LOCKER ROOM FEED Junp TING. NO ON LOYA LILLE

Attachment to Response to AG-1 Question No. 151 Page 10 of 73 Spanos

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Attachment to Response to AG-1 Question No. 151 Page 11 of 73 Spanos Min CREEL CONSTATION have 7:30 JUS DIDNEST KOUN JULIS Var Annie Public Mas Scenssel -EtPANDING LANAL - 2015 -2007 CATALIST REPLACEMENT - JONE ACCENDED SOME NED - 3-7 TENS REFURBICHING COM Some Unison COAL Mile Good Sox Ulfromes 17 MILLS FOR & WAITS - 10 m PROLOSE TO URADOR UNIT 4 MAS FRILLS UNIT A OUTALE - 2019 COOLUGE TOUSE MERSON UNIT | ELENDRIZON ASTLACED - DAILWAR 4558 - 2015 A LOT of BOILER WORK - KENNERON AND BOILDE TYPES - 2013-2015 USITI UNITA word as Remoster - 2015 UNIT 344 - Low NOX PURSE UBRISMO - MAT POT UP , 2 2000 Now TURBINE (Sothers An UNIT - MARK 6 2 NOW GSU STOP TRANSFORMERY - UNIT 3+4 - 2014 SPARES 3 New GSU TRANSFORMON - JUNITS 1+2 - 2015 Wardston Station Bong Killered For 3 UNITS TUNSING BLOOKS AND BULLOS KONGLOO ARWAY 7-1 ye overhous crue Exequeries for Unistand Purchasiso - 2001 2 STACKS STILL AMOND FOR SPARES UN17 102 SHARE STACK UNIT & JEWSON - HI doit - 5/2015 UNIT 2 Upit 1 " -5/2015 - 6/2014 when be working UNM 3 CORONTIAL CHANGES TO WATER TWONT

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Attachment to Response to AG-1 Question No. 151 Page 13 of 73 **Spanos** CANE LOD UNIT 7 GONELATING STATUS 10:00 TIM HARDER, MARK LATINE DOUNG TOUR LTPM . N PLACE for CTS - JUST for GAS ENSINUS SCHODSUD WARDES 2017 Fing Consuspins Instantial 1200 STAND on 14,000 110,000 - 518 BASE LONDED 50 Hours BELLEN ARCOL SRAM TUNBINE DUTALS 25,000 MONS 2 ON 1 UNITS UN1751-3 - Reginos 1980, UN.15 4-6 - Avained 12 2015 UNIT 7 - 642MW FIRST URMATING 4/15/15 CAN Kun IN MA TUST CTC Signas houses CR. Storn Burn VOLT MANS HACTURES HASGE World come is then twee I gaves ADDED GAS LINE BUILT ISKIN SUGTATION FOR CAME MAD UNIT 7 6AS PIRELAS (& MILES) LEVILLE PORD = CARE RW ROND) - TORES 695 JUPLICE 20" LINE. GAS AND JUSTATIN , & GENERATION ASSES COLO STANT UP ZING 18 ALS, ITOT STANT INA 30 ALS 12 STANT UPS SINCE OUT. 1 29 CHURS TO /00/ AUXILIAN BOUR

Attachment to Response to AG-1 Question No. 151 Page 14 of 73 Spanos

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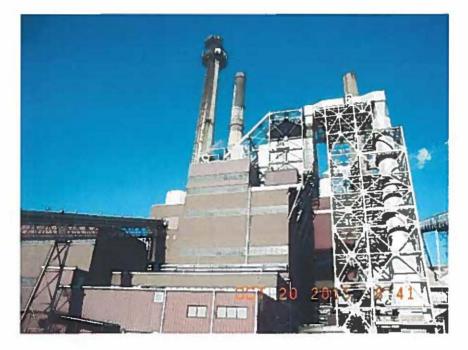
Ohio Falls Station Projects

- Construction of new admin building 2011 thru 2012
- 480V upgrade to plant 2012 thru 2013
- New Control Room 2014
- New Trash Racks 2013
- Unit rehabs
 - 1. 09-27-12 thru 06-09-14, (Unit went on forced outage several months before rehab due to a failure in the stator winding insulation).
 - 2. 01-30-13 thru 11-15-15 estimated, (Unit went on forced outage several months before rehab due to a failure in the lower turbine guide bearing and the inner head cover).
 - 3. 04-16-12 thru 07-12-13, (Unit was taken back off line on 09-29-14 at the request of the General Contractor due to a suspected runner design / installation error). Unit was released back to service on 03-02-15.
 - 4. 10-19-15, (Unit was just placed on outage). Estimated return to service 10-31-16.
 - 5. 07-05-11 thru 05-22-12, (Runner failed due to a design / installation error on 09-22-13). Unit was released back to service on 10-23-14.
 - 6. 2007
 - 7. 2006
 - 8. Rehab scheduled to begin in 10-16.

Attachment to Response to AG-1 Question No. 151 Page 16 of 73 **Spanos** Kenny Jourson OTOD FALL HADRO PLANT 12:40 Now ADMIN BUILDING New Control Bon AND TRASH RACKS 8 UNIS CONT. JUNO OSTATLET UNITS FAILURE UNIT 3 J. MILAR SETTRES COULD BUILDI & MAISTENSIUS SHOT - 2016 2017 - IRANDWING TRASA LERIONAL CRAME TRAFFER (81) TRASH RACKS - JOON TO BE HISTALIED ED Powcattoute Nos Annis Bou 8) Contros Loon GilmATONS 10mm = 125 mw UPGNODE NOW GUSBRATUNS FG UNT 7 GOVENSA-SYSTEM (A) U.L TANK / Pine F8 UNIT I TUBINE SHAFT Das Fourier CANAL SUBSTATION 1:30 138KN, 68KN + 14KN SUSTATION OLDER Station 13840 Oil Brogenes (89.) Transformer - 1324U - 164EU 6940 OL BROOKER 14 4U Bronkay Corrhor Buisise KULATS

Account 311, Structures & Improvements

October 19-21, 2015



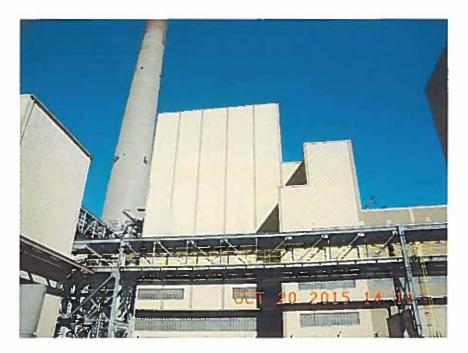
Units 1 & 2 at Brown Generating Station



Limestone Prep Building at Ghent Generating Station

Account 311, Structures & Improvements

October 19-21, 2015



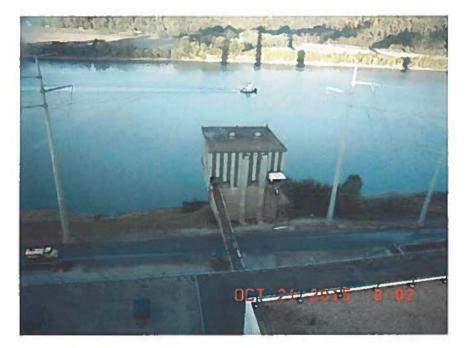
Unit 4 Boiler at Ghent Generating Station



Administration Building at Ghent Generating Station

Account 311, Structures & Improvements

October 19-21, 2015



Intake at Mill Creek Generating Station



Administration Building at Mill Creek Generating Station

Attachment to Response to AG-1 Question No. 151 Page 20 of 73 Spanos

LG&E & KU SERVICES

Account 311, Structures & Improvements

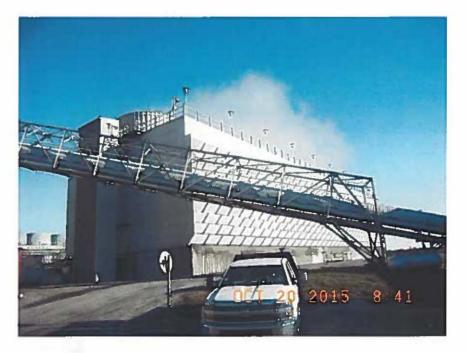
October 19-21, 2015



Office/Warehouse at Mill Creek/Riverfront Center

Account 312, Boiler Plant Equipment

October 19-21, 2015



New Unit 1 Cooling Tower at Brown Generating Station



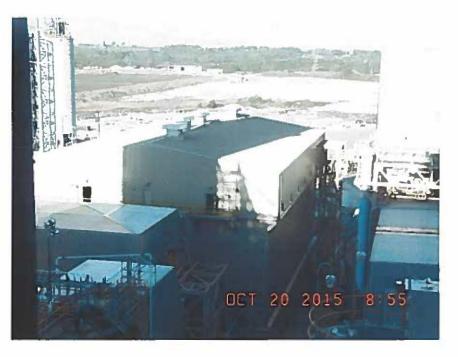
Unit 3 Coal Feeders at Brown Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Precipitator (being demolished) at Brown Generating Station



Baghouse at Brown Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Carbon and Lime Silos at Brown Generating Station



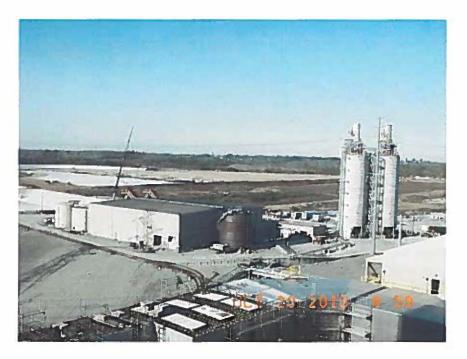
Scrubber at Brown Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Air Exhaust/ID Fan at Brown Generating Station



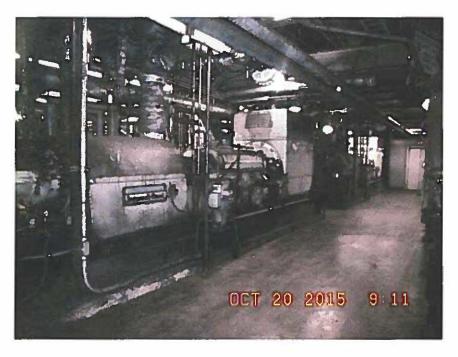


Account 312, Boiler Plant Equipment

October 19-21, 2015



Ammonia and Water System at Brown Generating Station



Boiler Feed Pumps at Brown Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 1 Pulverizers at Brown Generating Station



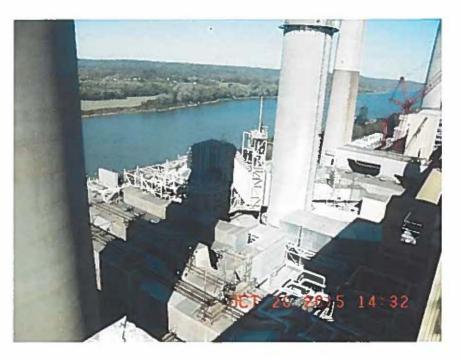
Pulverizers Unit 4 at Ghent Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



CCRT facility at Ghent Generating Station



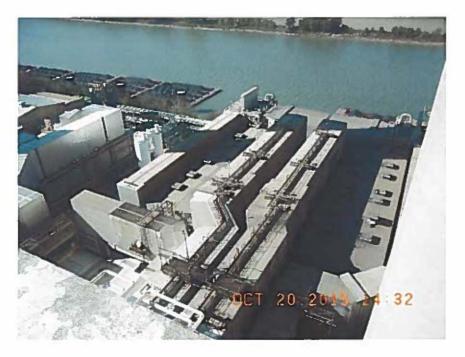
Unit 3 Scrubber at Ghent Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



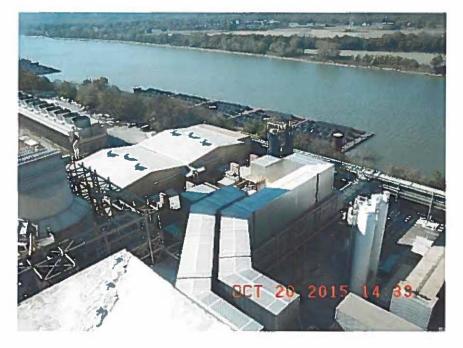
Unit 1 Scrubber at Ghent Generating Scrubber



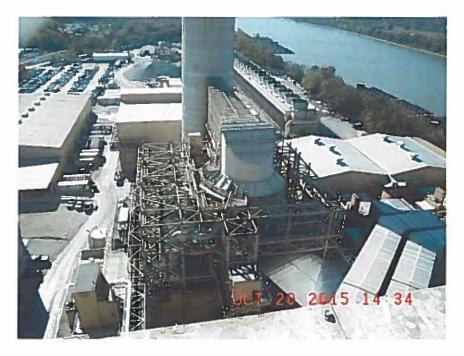
Unit 4 Precipitator at Ghent Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 4 Baghouse at Ghent Generating Station



Unit 4 Scrubber at Ghent Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Units 1-3 Stacks at Ghent Generating Station



Coal Feeders at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 3 Pulverizers at Mill Creek Generating Station



Boiler Feed Pump at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 4 Condenser at Mill Creek Generating Station



Stacks at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 1 Scrubber at Mill Creek Generating Station



Unit 3 Baghouse at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 2 SCR at Mill Creek Generating Station



Unit 3 SCR at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Unit 2 Cooling Tower and Precipitator at Mill Creek Generating Station



Unit 4 Scrubber at Mill Creek Generating Station

Account 312, Boiler Plant Equipment

October 19-21, 2015



Limestone Slurry and Unit 4 Cooling Tower at Mill Creek Generating Station



Steam Driven Boiler Feed Pump (Unit 3) at Mill Creek Generating Station

Account 314, Turbogenerator Units

October 19-21, 2015



Unit 3 Turbine at Brown Generating Station



Unit 3 Turbine at Ghent Generating Station

Attachment to Response to AG-1 Question No. 151 Page 38 of 73 Spanos

LG&E & KU SERVICES

Account 314, Turbogenerator Units

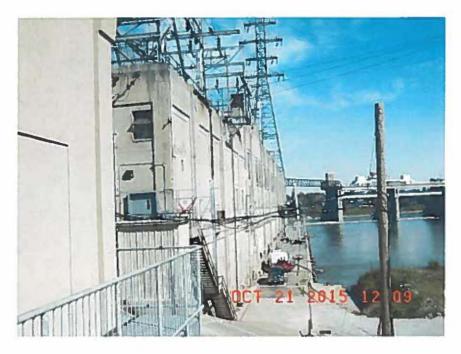
October 19-21, 2015



Units 1 & 2 Turbines at Mill Creek Generating Station

Account 331, Structures & Improvements

October 19-21, 2015



Powerhouse at Ohio Falls Hydro Station



New Administration Building at Ohio Falls Hydro Plant

Attachment to Response to AG-1 Question No. 151 Page 40 of 73 Spanos

LG&E & KU SERVICES

Account 332, Reservoirs, Dams & Waterway

October 19-21, 2015



Trash Racks (soon to be installed) at Ohio Falls Hydro Station

Account 333, Water Wheels, Turbines & Generators October 19-21, 2015



Generators at Ohio Falls Hydro Plant



Unit 7 Governor System at Ohio Falls Hydro Plant

Account 333, Water Wheels, Turbines & Generators October 19-21, 2015



Oil Tank and Pump at Ohio Falls Hydro Plant



Unit 1 Turbine Shaft at Ohio Falls Hydro Plant

Attachment to Response to AG-1 Question No. 151 Page 43 of 73 Spanos

LG&E & KU SERVICES

Account 334, Accessory Electric Equipment

October 19-21, 2015



Control Room at Ohio Falls Hydro Plant

Account 341, Structures & Improvements

October 19-21, 2015



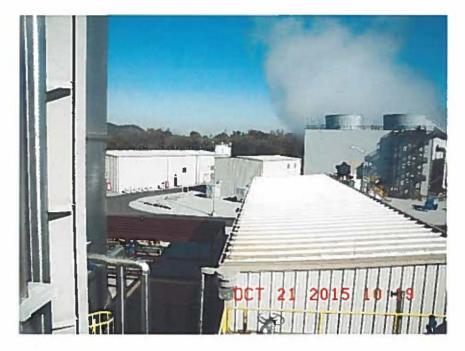
Brown CTs



Steam Turbine Building at Cane Run Unit 7

Account 341, Structures & Improvements

October 19-21, 2015



Gas Compressor and Water Treatment Buildings at Cane Run Unit 7



Office at Cane Run Unit 7 Generating Station

Account 343, Prime Movers

October 19-21, 2015



Cooling Tower at Cane Run Unit 7 Generating Station



Gas Compressors at Cane Run Unit 7 Generating Station



October 19-21, 2015



HRSGs at Cane Run Unit 7 Generating Station



Heat Exchangers at Cane Run Unit 7 Generating Station

Attachment to Response to AG-1 Question No. 151 Page 48 of 73 Spanos

LG&E & KU SERVICES

Account 343, Prime Movers

October 19-21, 2015



Auxiliary Boiler at Cane Run Unit 7 Generating Station

Account 344, Generators

October 19-21, 2015



Gas Turbine at Cane Run Unit 7



Air Inlet at Cane Run Unit 7 Generating Station

Account 344, Generators

October 19-21, 2015



Condesate Pumps at Cane Run Unit 7



Condenser at Cane Run Unit 7

Attachment to Response to AG-1 Question No. 151 Page 51 of 73 Spanos

LG&E & KU SERVICES

Account 344, Generators

October 19-21, 2015

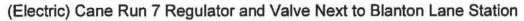


Steam Turbine at Cane Run Unit 7 Generating Station

Account 346, Miscellaneous Plant Equipment

October 19-21, 2015



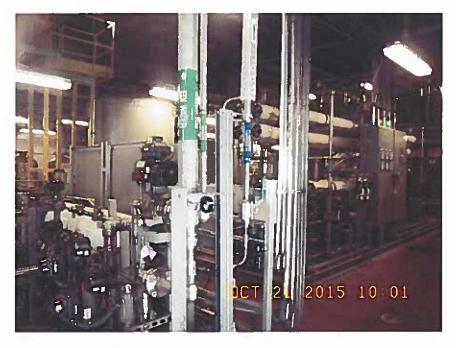




Chemical Treatment at Cane Run Unit 7

Account 346, Miscellaneous Plant Equipment

October 19-21, 2015



Reverse Osmosis at Cane Run Unit 7



Filter Press (2) at Cane Run Unit 7

Attachment to Response to AG-1 Question No. 151 Page 54 of 73 Spanos

LG&E & KU SERVICES

Account 346, Miscellaneous Plant Equipment

October 19-21, 2015



Water Clarifiers at Cane Run Unit 7

Account 352, Structures & Improvements

October 19-21, 2015



Control Building at Higby Mill Substation



Control Building at Toyota North Substation

Attachment to Response to AG-1 Question No. 151 Page 56 of 73 Spanos

LG&E & KU SERVICES

Account 352, Structures & Improvements

October 19-21, 2015



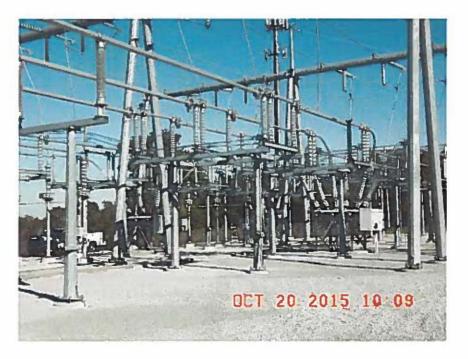
Control Building at Canal Substation

Account 353, Station Equipment

October 19-21, 2015



Relays at Higby Mill Substation



138KV Breakers at Higby Mill Substation

Account 353, Station Equipment

October 19-21, 2015



Capacitor Bank and SF₆ Breakers at Higby Mill Substation



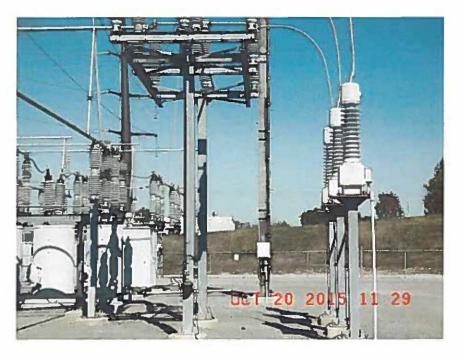
Oil Breakers and Transformers at Higby Mill Substation

Account 353, Station Equipment

October 19-21, 2015



Oil Breakers and Transformer at Toyota North Substation



Potential Transformers at Toyota North Substation

Account 353, Station Equipment

October 19-21, 2015



Relays at Toyota North Substation



138KV Oil Breakers at Canal Substation

Account 353, Station Equipment

October 19-21, 2015



Transformer at Canal Substation



69KV Oil Breakers at Canal Substation

Attachment to Response to AG-1 Question No. 151 Page 62 of 73 Spanos

LG&E & KU SERVICES

Account 353, Station Equipment

October 19-21, 2015



Relays at Canal Substation

Account 362, Station Equipment

October 19-21, 2015



Transformer and Vacuum Breakers at Higby Mill Substation



Vacuum Breakers at Toyota North Substation

Account 362, Station Equipment

October 19-21, 2015



14KV Breakers at Canal Substation

Account 375, Structures and Improvements

October 19-21, 2015



Regulator Building at Penile City Gate Station



Regulator Building at St. Helens Regulator Station

Account 378, Measuring & Regulating Station Equip. October 19-21, 2015



Regulator at Blanton Lane Regulator Station



Regulator Runs at St. Helens Regulator Station

Attachment to Response to AG-1 Question No. 151 Page 67 of 73 Spanos

LG&E & KU SERVICES

Account 378, Measuring & Regulating Station Equip. October 19-21, 2015



Pig Launch at St. Helens Regulator Station

Account 378, Meas. & Reg. Station Equip.-City Gate October 19-21, 2015



Separator and Odorant at Penile City Gate Station



Heaters at Penile City Gate Station

Account 379, Meas. & Reg. Station Equip.-City Gate October 19-21, 2015



Regulator Runs at Penile City Gate Station



Regulator Runs at Penile City Gate Station

Account 379, Meas. & Reg. Station Equip.-City Gate October 19-21, 2015



Odorant Tank and Piping at Cane Run City Gate Station





Account 390, Structures & Improvements

October 19-21, 2015



Garage at Auburndale Service Center



Vehicle Canopy at Auburndale Service Center

Account 390, Structures & Improvements

October 19-21, 2015



EU Charging Station at Auburndale Service Center



Warehouse at Auburndale Service Center

Attachment to Response to AG-1 Question No. 151 Page 73 of 73 Spanos

LG&E & KU SERVICES

Account 390, Structures & Improvements

October 19-21, 2015



Storeroom at Auburndale Service Center

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 152

Responding Witness: John J. Spanos

- Q-152. Regarding the current and proposed depreciation rates:
 - a. How are the depreciation rates currently in use calculated?
 - b. Provide the details of KU's current depreciation rates in electronic format (Excel), with all formulae intact, including (1) Plant Balances, (2) Accumulated Depreciation, (3) Net Plant, (4) Cost of Removal/Salvage, (5) Remaining Useful Life, (6) Annual Accrual, (7) Depreciation Ratio, etc.
- A-152. a. The depreciation rates currently in use are calculated using the straight line method, average service life procedure and remaining life basis.
 - b. Given the fact that depreciation rates are affected by multiple factors which change as surviving age of plant changes and the reserve to plant ratio changes over time and the calculation date changes, it is not possible to provide the information requested. However, the life and net salvage parameters requested which were utilized to produce the current rates are set forth in response to Question No. 198.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 153

Responding Witness: John J. Spanos

- Q-153. Does the Company's depreciation study include any adjustment or calculation to amortize the variance between the book depreciation reserve and the calculated accrued depreciation?
 - a. If so, provide that calculation in electronic (Excel) format with all formulae intact. If not, explain fully why not.
 - b. Based on the Company's calculations, does KU have a reserve excess or deficiency?
 - c. Is KU proposing any amortization of any reserve imbalance? If yes, explain where that is shown in his study and also in the Company's revenue requirement filing.
- A-153. a. The remaining life method calculates the variance between the book depreciation reserve and the calculated accrued depreciation in its development of the rates. This is the standard practice across the United States.
 - b. Reserve excess or deficiencies are different for every account and addressed in the development of the rate over the remaining life for each account.
 - c. There is no need for any amortization of a reserve imbalance when using the remaining life technique.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 154

Responding Witness: Valerie L. Scott

- Q-154. Provide all internal and external audit reports, management letters, consultants' reports, etc. which address in any way, the Company's property accounting and/or depreciation practices.
- See Tab 49 of the Filing Requirements and the direct testimony and exhibits of A-154. John J. Spanos for consultants' reports surrounding the Company's property accounting and depreciation practices. In Case No. 2015-00355, the Commission approved a depreciation rate for Electric Vehicle Charging Stations. The final Order approving the depreciation rate and all related case documents can be found at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2015-00355. In Case No. 2016-00063, the Commission approved depreciation rates for the Brown Solar Facility. The final Order approving the depreciation rates and all related documents found case can be at http://psc.ky.gov/PSC WebNet/ViewCaseFilings.aspx?case=2016-00063. No internal audit reports, external audit reports or management letters have been received related to the Company's property accounting or depreciation practices.

CASE NO. 2016-00370

Response to Attorney General's Initial Data Requests for Information Dated January 11, 2017

Question No. 155

Responding Witness: Valerie L. Scott

- Q-155. Provide copies of all Board of Director's minutes and internal management meeting minutes in which the subject of the Company's depreciation rates or retirement unit costs was discussed.
- A-155. The Company has no Board of Director's minutes or internal management meeting minutes in which the subject of the Company's depreciation rates or retirement unit costs was discussed.